

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AMYRIS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-11131 (TMH)

(Jointly Administered)

**THE DEBTORS' NOTICE OF 30(b)(6) DEPOSITION
OF THE TRUSTEE OF THE BPA TRUST, MEMBER
OF THE AD HOC CROSS-HOLDER GROUP**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) Federal Rule of Civil Procedure 30(b)(6), made applicable herein pursuant to Federal Rules of Bankruptcy Procedure 7030 and 9014, Amyris, Inc., et al, the above-captioned debtors and debtors in possession (the “Debtors” or “Amyris”) will take the deposition upon oral examination of the Trustee of the BPA Trust (the “Trust”) by the person(s) most qualified to testify on the Trust’s behalf with respect to the topics described in **Exhibit A** attached hereto.

The deposition will take place on a date and time to be determined. The deposition will be conducted remotely.

With respect to the conduct of this remote deposition:

1. Counsel for the parties and their clients will be participating from various, separate locations;
2. The court reporter will administer the oath to the witness remotely;
3. Each participating attorney must be visible to all other participants, and their statements will be audible to all participants;

¹ A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.stretto.com/Amyris>. The location of Debtor Amyris Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

4. All exhibits will be provided simultaneously and electronically to the witness and all participants;
5. The court reporter will record the testimony;
6. The deposition may be videotaped; and
7. The deposition may be recorded electronically through the use of Realtime or a similar application.

Dated: December 18, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Alan J. Kornfeld

Richard M. Pachulski (admitted *pro hac vice*)

Debra I. Grassgreen (admitted *pro hac vice*)

Alan J. Kornfeld (admitted *pro hac vice*)

James E. O'Neill (DE Bar No. 4042)

Steven W. Golden (DE Bar No. 6807)

919 N. Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899-8705 (Courier 19801)

Telephone: (302) 652-4100

Facsimile: (302) 652-4400

rpachulski@pszjlaw.com

dgrassgreen@pszjlaw.com

akornfeld@pszjlaw.com

joneill@pszjlaw.com

sgolden@pszjlaw.com

Counsel to the Debtors and Debtors in Possession

EXHIBIT A¹

1. All Valuations prepared by You, for You, or at Your direction of the Debtors and/or any or all of the Debtors' assets.
2. All Communications Concerning any Valuation.
3. The value of Your investment in the Debtors' securities (including any investment memoranda or similar Documents), including the value of Your investment in the Convertible Senior Notes.
4. All Communications between You and any Noteholder Concerning the Debtors, any Valuation, the Convertible Senior Notes, the Plan, and/or the Disclosure Statement.
5. All Communications between You and John Melo.
6. All Communications between You and the Indenture Trustee Concerning the Debtors, any Valuation, the Convertible Senior Notes, the Plan, and/or the Disclosure Statement.

¹ All capitalized terms used herein are defined in the Debtors' Request for Production of Documents to Bryan Abboud, as Trustee of the BPA Trust and as General Partner of Abboud Limited Partnership, Member of the Ad Hoc Cross-Holder Group, served concurrently herewith.